

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI**

JACKSON WOMEN’S HEALTH
ORGANIZATION, on behalf of itself and its
patients,

and

SACHEEN CARR-ELLIS, M.D., M.P.H., on behalf
of herself and her patients,

Plaintiffs,

vs.

Case No. 3:18cv171-CWR-FKB

MARY CURRIER, M.D., M.P.H., in her
official capacity as State Health Officer of
the Mississippi Department of Health,

and

MISSISSIPPI STATE BOARD OF MEDICAL
LICENSURE,

and

KENNETH CLEVELAND, M.D., in his
official capacity as Executive Director of the
Mississippi State Board of Medical Licensure,

Defendants.

PLAINTIFFS’ MOTION FOR TEMPORARY RESTRAINING ORDER

Pursuant to Rule 65 of the Federal Rules of Civil Procedure, Plaintiffs, by and through their undersigned counsel, hereby move this Court to issue an immediate temporary restraining order, restraining Defendants, and their agents and successors in office, from enforcing Mississippi House Bill 1510 (“the Act”). The Act unconstitutionally bans abortion after 15 weeks of pregnancy, months prior to viability, in contravention of decades of United States Supreme Court precedent. The Act also has an immediate effective date. Accordingly, without

an order from the Court, Plaintiffs will have to cease providing abortion services after 15 weeks of pregnancy, including canceling an appointment already scheduled for Tuesday, March 20, at 2 pm, causing immediate and irreparable harm to their patients.

In support of this Motion for Temporary Restraining Order, Plaintiffs respectfully submit the following documents:

- Memorandum of Law in Support of Plaintiffs' Motion for Temporary Restraining Order; and,
- Declaration of Sacheen Carr-Ellis in Support of Plaintiffs' Motion for Temporary Restraining Order.

The Attorney General's Office has been informed by telephone of this motion and will be receiving it through ECF upon filing. The State Defendants were served with process this afternoon

Respectfully submitted this 19th day of March, 2018.

/s/ Robert B. McDuff

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*Pro Hac Vice Application to be Filed

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of Plaintiffs' Motion for Temporary Restraining Order and the Declaration of Sacheen Carr-Ellis in Support of Plaintiffs' Motion for Temporary Restraining Order are being served through the Court's ECF system on counsel for the defendants:

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This the 19th day of March, 2018.

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